

SEALED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

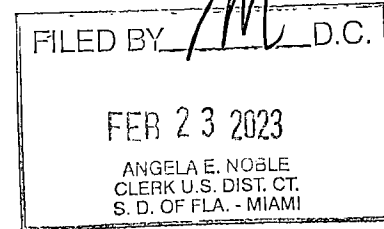
RYAN BRESLOW, ALEX FINE, and JON  
GORDON,

Plaintiffs,

vs.

MARK PHILLIPS and BENJAMIN REED,

Defendants.



**PLAINTIFFS' *EX PARTE* MOTION FOR LEAVE TO FILE MEMORANDUM OF LAW  
IN EXCESS OF THE PAGE LIMITATION SET OUT IN LOCAL RULE 7.1(c) AND  
MEMORANDUM IN SUPPORT THEREOF**

Plaintiffs Ryan Breslow ("Breslow"), Alex Fine ("Fine"), and Jon Gordon ("Gordon") (collectively, "Plaintiffs"), respectfully request leave to file their *Ex Parte* Motion for Temporary Restraining Order (the "Motion") and supporting memorandum in excess of Local Rule 7.1(c)'s twenty-page limit. In support thereof, Plaintiffs state as follows:

1. Local Rule 7.1(c) authorizes this Court to grant leave to file a memorandum in excess of the twenty-page limit set forth in the Local Rule.
2. The Motion is 34 pages long, as calculated according to Local Rule 7.1. Plaintiffs made every effort to make their brief concise. However, given the nature of Plaintiffs' claims, the complexity of the factual issues involved, and their request for a temporary restraining order without notice to Defendants, Plaintiffs were required to exceed the twenty-page limit in order to show the compelling need for the extraordinary relief requested.
3. Specifically, the Motion seeks relief against two defendants based on a complex fraud, perpetrated over two years, involving a number of cryptocurrency transactions sent to and

from a variety of cryptocurrency wallets. The steps that Defendants took to orchestrate this fraud were intricate and a detailed recitation of Defendants' conduct was necessary to establish Plaintiffs' right to injunctive relief.

4. Moreover, Plaintiffs' claim for injunctive relief is based on its likelihood of success on three distinct underlying causes of action: (1) fraud; (2) breach of fiduciary duty; and (3) civil conspiracy. All three theories of liability are addressed in the Motion.

5. Lastly, the evidence offered by Plaintiffs in support of the Motion is both voluminous and complex. For example, Plaintiffs have provided the Court with a number of records that depict blockchain transactions over the past six months. The Motion explains the nature and import of this evidence for the Court.

6. Plaintiffs made every effort to limit the length of the Motion. Despite those good-faith efforts, they are unable to fully brief the issues in less than twenty pages. Accordingly, Plaintiffs respectfully request leave to exceed Local Rule 7.1(c)'s twenty-page limit.

Date: February 23, 2023

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